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28 AUG 2003

From: Commanding Officer, Navy Environmental Health Center
To: Commanding Officer, Atlantic Division, Naval Facilities Engineering Command
(Kirk Stevens), 1510 Gilbert Street, Norfolk, VA 23511-2699

Subj: HEALTH AND SAFETY PLAN REVIEW FOR PILOT STUDY, OPERABLE
UNIT 21 (Site 73), MARINE CORPS BASE CAMP LEJEUNE, NC

Ref: (a) Michael Baker Jr., Inc. ltr 28 Jul 03

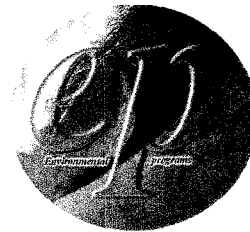
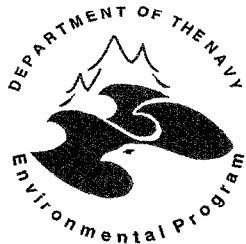
Encl: (1) Subject Health and Safety Plan Review

1. Per reference (a), we have completed a review of the subject document and are forwarding our comments to you as enclosure (1).
2. We are available to discuss the enclosed information by telephone with you and, if you desire, with you and your contractor. If you require additional assistance, please call Mr. Donald J. Coons at (757) 953-0936 or Mr. David F. McConaughy at (757) 953-0942. The DSN prefix is 377. The e-mail addresses are: coonsd@nehc.med.navy.mil and mcconaughyd@nehc.med.navy.mil.

C. P. RENNIX

By direction

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NAVY ENVIRONMENTAL HEALTH CENTER ENVIRONMENTAL PROGRAMS DIRECTORATE

Health and Safety Plan Review

Location: Jacksonville, N. C.

Command: MCB Camp Lejeune

Site: Operable Unit 21 (Site 73)

Work Description: Pilot Study

Document Date: July 2003

Contract No/Contract Task Order No: N62470-95-D-6007/0253

EP Document No: 1566

Prepared for: LANTNAVFACENGCOM

Prepared by: CH2MHILL Federal Group, LTD/Michael Baker Jr., INC.

Date Received: 1 August 2003

Reviewed by:

Mr. Donald J. Coons, (757) 953-0936, coonsd@nehc.med.navy.mil, DSN 377

HEALTH AND SAFETY PLAN REVIEW

- Ref: (a) 29 CFR 1910.120 (Hazardous Waste Operations and Emergency Response)
(b) 29 CFR 1926.65 (Hazardous Waste Operations and Emergency Response)
(c) Navy/Marine Corps Installation Restoration Manual (February 1997)
(d) U. S. Army Corps of Engineers, Safety and Health Requirements Manual, EM 385-1-1

General Comment: We compared this health and safety plan (HASP) to federal requirements found in references (a) through (d), and have noted discrepancies in this HASP from these primary references. The acronyms used in our comments are included as Attachment (1).

Administrative Comment: Activity/Task hazard analyses were not provided with this health and safety plan. A site-specific activity/task hazard analyses must be prepared for each major task to be performed under this scope of work. A properly completed activity/task hazard analysis should list the major steps of each task, the hazards anticipated, and the methods or procedures to control or minimize the hazards. We highly recommend the three column format found in the U. S. Army Corps of Engineers *Safety and Health Requirements Manual*, EM 385-1-1, 3 September 1996, page 4, Figure 1-1, both for its simplicity and ease of use to ensure completeness of the review.

Specific Comments:

1. Pages 1-1 through 1-3, "Introduction":

Comments:

a. Section 1.1, "Policy," fourth sentence states, "However, subcontractors are expected to provide their own HASP and relevant Standard Operating Procedures (SOPs) that pertain to the activities they are contracted to perform on the site." A requirement that subcontractor submittals will be reviewed by a Baker (prime contractor) representative prior to start of on-site work is not included.

b. Section 1.2, "Scope," cites 29 CFR 1925.65 as a HAZWOPER standard vice 29 CFR 1926.65.

Recommendations:

a. Include a requirement for a Baker representative to review subcontractor submittals in the final HASP.

b. Revise the final site-specific HASP to provide the correct citation of 29 CFR 1926.65.

2. Pages 5-1 and 5-2, "Exposure Monitoring":

Comment: Information is not provided indicating if monitoring for combustible gases will be performed. In view of the explosive/flammable nature of the hydrogen gas and some of the VOCs, we feel that the use of a combustible gas indicator (CGI) would be appropriate.

Recommendation: Include information stating when and where monitoring with a CGI is to be performed. If it is not considered to be necessary, include rationale for not performing the monitoring.

3. Page 7-2, Section 7.3, "Equipment Decontamination":

Comment: Information provided states that decontamination of equipment will be based on the size and type of equipment used. The Field Sampling and Analysis Plan (FSAP) is cited for specific decontamination procedures for Site 73. Guidance in the FSAP is noted to address decontamination procedures for sampling equipment only, with no guidance for decontaminating heavy equipment or the containerization of spent decontamination fluids. Additionally, an activity/task hazard analysis for the task of decontaminating heavy equipment is not included with the health and safety plan.

Recommendation: Include guidance for containerization and proper disposal of all spent decontamination fluids. Further, provide an activity/task hazard analysis for the proper decontamination of heavy equipment used during this scope of work.

4. Table 8-1, "Emergency Telephone Numbers":

Comment: Another telephone number available for contacting the local poison control center is 1-800-222-1222, a national poison control center switch. Calling the national number is supposed to place the caller in contact with the poison control center closest to where the call is placed.

5. Appendix A, "Baker Safety Standard Operating Procedures (SOPs)":

Comment: Five SOPs are listed on the cover page including one for Heat Stress Prevention. The SOP for the Heat Stress Program is not included with the HASP.

Recommendation: Ensure that the SOP for Heat Stress Prevention is included in the final site-specific HASP.

ACRONYMS

ACGIH:	American Conference of Governmental Industrial Hygienists
ANSI:	American National Standards Institute
ATSDR:	Agency for Toxic Substances and Disease Registry
BBP:	Bloodborne Pathogen Program
COC:	Contaminant of Concern
CPR:	Cardiopulmonary Resuscitation
CRZ:	Contamination Reduction Zone
EIC:	Engineer-in-Charge
EMS:	Emergency Medical Service
EPA:	Environmental Protection Agency
EZ:	Exclusion Zone
HBV:	Hepatitis B Virus
HIV:	Human Immunodeficiency Virus
IDLH:	Immediately Dangerous to Life and Health
LEL	Lower Explosive Limit
LEPC:	Local Emergency Planning Committee
MSDS:	Material Safety Data Sheet
NIOSH:	National Institute for Occupational Safety and Health
NOSC:	Navy On-Scene Coordinator
NOSCDR:	Navy On-Scene Commander
OSHA:	Occupational Safety and Health Administration
OV:	Organic Vapor
PCB:	Polychlorinated Biphenyl
PEL:	Permissible Exposure Limit
PID:	Photoionization Device
PPE:	Personal Protective Equipment
PPM:	Parts Per Million
SCBA:	Self Contained Breathing Apparatus
SOP:	Standard Operating Procedure
STEL:	Short Term Exposure Limit
TLV:	Threshold Limit Value